

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
CIVIL COVER SHEET**

**I. (a) PLAINTIFFS**

Kyle N. Williams  
1471 W 9 Mile Road, Apt 5  
Ferndale, MI 48220  
Pro Se

Case: 2:25-cv-11285

Assigned To : Michelson, Laurie J.

Referral Judge: Stafford, Elizabeth A.

Assign. Date : 5/2/2025

Description: CMP WILLIAMS V.  
AMERICAN EXPRESS GLOBAL  
BUSINESS TRAVEL (NA)

**(b) DEFENDANTS**

American Express Global Business Travel  
666 3rd Ave, FL 4  
New York, NY 10017

**County of Residence of First Listed Plaintiff:** Oakland

**County of Residence of First Listed Defendant:** New York (Outside of Michigan)

**II. BASIS OF JURISDICTION**

☒ Federal Question (U.S. Government is not a party)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**

(Plaintiff) 1 Citizen of This State

(Defendant) 4 Incorporated or Principal Place of Business in Another State

**IV. NATURE OF SUIT**

☒ 442 Civil Rights: Employment

**V. ORIGIN**

☒ 1 Original Proceeding

**VI. CAUSE OF ACTION**

U.S. Civil Statute: 42 U.S.C. § 12112 (ADA Discrimination), 42 U.S.C. § 12203 (Retaliation)

Brief Description: Disability discrimination, retaliation, and hostile work environment.

**VII. REQUESTED IN COMPLAINT**

Class Action: Yes ☒ No

Demand: \$1,500,000

Jury Demand: ☒ Yes No

**VIII. RELATED CASES**

(None)

**DATE:** May 1, 2025

**SIGNATURE OF PLAINTIFF:** Kyle Williams

Kyle N. Williams, Pro Se

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**KYLE N. WILLIAMS**

1471 W 9 Mile Road, Apt 5  
Ferndale, MI 48220  
Plaintiff, Pro Se

v.

**AMERICAN EXPRESS GLOBAL BUSINESS TRAVEL**

666 3rd Ave, FL 4  
New York, NY 10017  
Defendant

Case No.: \_\_\_\_\_

Jury Trial Demanded

**COMPLAINT FOR EMPLOYMENT DISCRIMINATION**

**I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this action under 42 U.S.C. § 12117 (Americans with Disabilities Act) and 28 U.S.C. § 1331 (federal question).
2. Venue is proper in this district because the events giving rise to these claims occurred in Ferndale, Michigan.

**II. PARTIES**

3. Plaintiff, Kyle N. Williams, is a resident of Oakland County, Michigan and a qualified individual with disabilities, including PTSD, severe depression, and generalized anxiety disorder.
4. Defendant, American Express Global Business Travel, is a corporation with more than 500 employees and does business in Michigan.

**III. STATEMENT OF FACTS**

5. Plaintiff began working for Defendant as a Travel Consultant on or about October 17, 2023.
6. Plaintiff has a qualifying disability under the ADA.
7. On or about February 16, 2024, Plaintiff requested a reasonable accommodation for intermittent or reduced hour leave due to disability.
8. Plaintiff submitted paperwork for the accommodation by March 2, 2024, and received conditional approval pending review.
9. Plaintiff's accommodation was approved on March 26, 2024.
10. After approval, Plaintiff's manager, Wendy Jones, began excessively monitoring Plaintiff's calls and scrutinizing Plaintiff's work more than other employees.
11. On April 22, 2024, less than 30 days after accommodation approval, Plaintiff was terminated for alleged "policy violations" that Plaintiff did not commit.



12. Plaintiff believes the stated reason for termination was false and a pretext for discrimination and retaliation for requesting a reasonable accommodation.
13. Plaintiff did not break any company policies and followed all required protocols.
14. Prior to disclosing his disability, Plaintiff was not subject to such heightened scrutiny or threats of termination.
15. As a result of Defendant's actions, Plaintiff suffered severe emotional distress, including worsening PTSD, depression, and anxiety.
16. Plaintiff was unemployed for 10 months after termination and incurred significant debt as a result.

#### **IV. CLAIMS**

##### **Count I – Disability Discrimination (ADA)**

17. Defendant discriminated against Plaintiff by terminating his employment because of his disability and because he requested a reasonable accommodation.

##### **Count II – Retaliation (ADA)**

18. Defendant retaliated against Plaintiff for engaging in protected activity under the ADA by requesting a reasonable accommodation and then terminating him.

##### **Count III – Hostile Work Environment**

19. Defendant subjected Plaintiff to a hostile work environment by excessively monitoring and targeting Plaintiff after disclosure of his disability and accommodation request.

#### **V. RELIEF REQUESTED**

Plaintiff respectfully requests that the Court:

- a. Award back pay for lost wages and benefits;
- b. Award compensatory damages for emotional distress, pain and suffering, and mental anguish;
- c. Award punitive damages to deter future misconduct;
- d. Award front pay or reinstatement, as appropriate;
- e. Award reasonable attorney's fees and costs (if Plaintiff retains counsel);
- f. Order Defendant to expunge any record of discipline or termination related to Plaintiff's disability or accommodation request;
- g. Order Defendant to provide ADA training to management and HR staff;
- h. Grant any other relief the Court deems just and proper.

#### **VI. JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

#### **VII. EXHIBITS**

- Exhibit A: EEOC Charge of Discrimination (Charge No. 520-2024-07550)

- Exhibit B: EEOC Dismissal and Notice of Rights (issued 02/03/2025)

**Respectfully submitted,**

Kyle N. Williams  
1471 W 9 Mile Road, Apt 5  
Ferndale, MI 48220

(313) 378-0974

Date: May 1, 2025